

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

KENNETH COURTRIGHT

No. 20 CR 77

Judge Matthew F. Kennelly

**MOTION FOR EXTENSION OF TIME TO  
PRODUCE DISCOVERY MATERIALS**

The UNITED STATES OF AMERICA, by its attorney, JOHN R. LAUSCH, JR., United States Attorney for the Northern District of Illinois, hereby presents this motion for an extension of time to produce discovery materials, and in support, states as follows:

1. On February 26, 2021, this Court ordered the government to produce in discovery by March 31, 2021, certain SEC materials. As the government has previously noted, these SEC materials consist of approximately 4 million documents, most of which were obtained by the SEC from the court-appointed receiver in the SEC's civil case against defendant that is currently pending before Judge Wood, 19 CV 8454.

2. The government has been in communication with defense counsel about the form of this production, and defense counsel has stated that he wants the materials produced in a PDF format in one production and not on a rolling basis.

3. Given the size and format of the materials, they require processing at an off-site location. The processing and conversion of the materials began on or about February 5, 2021. The estimated completion date for the materials to be processed and converted, given the size and format, is April 9, 2021. If that process is completed by April 9, 2021, the government anticipates being able to load the materials on to a hard drive and produce them to the defendant by April 16, 2021.

4. To date, the government has provided substantial discovery to the defendant, including the materials the government used to indict this case, all of the investigative FBI 302 reports generated after interviews conducted during the investigation, and Grand Jury materials, including Grand Jury transcripts and exhibits. The total number of documents that have already been produced include approximately 87,000 pages of materials.

WHEREFORE, based on the above, the government seeks an extension of time to produce discovery materials to April 16, 2021.

Respectfully submitted,

JOHN R. LAUSCH, JR.  
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Dated: March 11, 2021